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10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

18 ☐ Affects PG&E Corporation

19 ☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

REORGANIZED DEBTORS' REPORT ON
RESPONSES TO ONE HUNDRED NINTH
OMNIBUS OBJECTION TO CLAIMS AND
REQUEST FOR ORDER BY DEFAULT AS
TO UNOPPOSED OBJECTIONS

[Re: Dkt. No. 11346]

Regarding Objections Set for Hearing
November 9, 2021, at 10:00 a.m. (Pacific Time)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the following omnibus claims
9 objection (the “**Omnibus Objection**”):

10

Docket Number	Omnibus Objection
11346	Reorganized Debtors’ One Hundred Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims) (the “ One Hundred Ninth Omnibus Objection ”)

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12

13 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

14 The Omnibus Objection seeks to reduce, disallow and/or expunge the Proofs of Claim listed in
15 Exhibit 1 and Exhibit 2 to the Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection
18 [Docket No. 11348]. The Omnibus Objection was also supported by the declaration of Robb
19 McWilliams [Docket No. 11347]. The Omnibus Objection, the Notice of Hearing, and the Declaration
20 were served as described in the *Certificate of Service of Sonia Akter*, filed on October 6, 2021 [Docket
21 No. 11382], each holder of a claim listed on Exhibit 1 and Exhibit 2 to the Omnibus Objection
22 received a notice customized to include (i) the claim number, debtor, claim amount and priority, and
23 the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed
24 and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim
25 amount and priority of the surviving claim for each counterparty.

26 The deadline to file responses or oppositions to the Omnibus Objection has passed. The
27 Reorganized Debtors have received the following formal and informal responses:
28

Docket No.	Claimant	Claim No.	Resolution
One Hundred Ninth Omnibus Objection			
Informal	State of Connecticut Unclaimed Property Division	6355; 8275	The One Hundred Ninth Omnibus Objection with respect to these Claims will be continued to the December 7, 2021 omnibus hearing.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objection except as described herein.
3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order (i) disallowing and/or expunging or (ii) allowing in a reduced amount the Proofs of Claim listed in **Exhibit A** to this Request, which listed Claims are identical to those listed in Exhibit 1 and Exhibit 2 to the Omnibus Objection, except as otherwise discussed above.

Dated: November 2, 2021

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors